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April 7, 2022

***VIA ELECTRONIC CASE FILING***

Hon. Jesse M. Furman  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 1007

Re: **Navigator's Management, Inc. a/s/o Century Sourcing, Inc., Today's Apparel, Inc.  
and RGE Motor Direct Inc. v. Evergreen Marine (UK) Limited and Evergreen  
Marine Corp. (Taiwan) Ltd., Case No. 1:21cv11134**

Dear Judge Furman:

We represent Defendant Evergreen Marine (UK) Limited and Evergreen Marine Corp. (Taiwan) Ltd. (collectively "Evergreen") in the above referenced action. We write to respectfully request that this Court adjourn the initial pretrial conference scheduled for April 13, 2022 and reset the date for May 16, 2022, a thirty (30) day extension. We have conferred with Plaintiff's counsel and they concur with our requested adjournment.

**Procedural History**

Plaintiff Navigator's Management, Inc. ("Plaintiff") filed its Complaint in this action on December 29, 2021. Dkt. #1. The Complaint alleges admiralty claims against Evergreen arising from the alleged loss of three containers of cargo shipped from Shanghai, China, and destined for California. The Complaint seeks damages in the amount of \$234,000.

Evergreen was served with Plaintiff's Complaint on February 23, 2022 and its initial deadline to file an answer or other responsive pleading was March 16, 2022. Dkts. #8 and #9.

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Evergreen requested a thirty (30) day extension to respond to Plaintiff's Complaint. This Court granted Evergreen's request for an extension, making Evergreen's deadline to file a responsive pleading April 15, 2022. Dkt. # 11. Evergreen will be filing a responsive pleading by said date.

As of now, the next and only scheduled appearance before this Court is the initial pretrial conference scheduled on April 13, 2022, to be held telephonically. Dkt. #12.

**Request for Adjournment**

Evergreen's request for adjournment is made pursuant to your Honor's Individual Rules & Practices in Civil Cases of July 13, 2021 Rule 1(F). Evergreen, through counsel, has previously attempted to make contact with Plaintiff's counsel by phone and email to engage in preliminary discussions. On April 7, 2022, Plaintiff's counsel was able to reach out to Evergreen and kindly notified Evergreen that their phone service had been malfunctioning. Given the fact that parties were unable to confer until today, April 7, 2022, and the fact that Evergreen has yet to file a responsive pleading in this action, both parties agreed that the initial pretrial conference should be adjourned until after Evergreen files its responsive pleading. If granted, the parties propose setting the initial pretrial conference for May 16, 2022. Pursuant to your Honor's Scheduling Order, a proposed case management plan and joint letter would be due May 12, 2022, the Thursday prior to the conference.

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For the foregoing reasons, Defendant Evergreen respectfully requests its request for adjournment of the initial pretrial conference scheduled for April 13, 2022 to be granted and for the initial pretrial conference to subsequently be reset to May 16, 2022.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'ZJF', with a long, sweeping horizontal stroke extending to the right.

Zachary J. Farley

ZJF

Application GRANTED. The initial pretrial conference currently scheduled for April 13, 2022, is hereby ADJOURNED to **May 16, 2022**, at **4:00 p.m.** The Clerk of Court is directed to terminate ECF No. 13.

SO ORDERED.

A handwritten signature in black ink, appearing to read 'Jesse M. Furman', with a large, stylized 'J' and 'F'.

April 8, 2022